

IN THE DISTRICT COURT OF THE UNITED STATES  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION

LARRY CARL DIXON (AIS #138238),

Plaintiff,

V.

WILLIE THOMAS, et al.

Defendants.

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CASE NO.: 2:06-CV-164-WKW

**DEFENDANT'S MOTION TO EXTEND TIME TO FILE**  
**SPECIAL REPORT AND ANSWER**

COMES NOW Defendant Prison Health Services, Inc. and respectfully requests that this Honorable Court extend the time period that this Defendant has to file its Answer and Special Report in this action by fourteen (14) days, up to and including April 24, 2006. As grounds for this Motion, Defendant shows to the Court as follows:

1. This lawsuit alleges negligence with regard to the control and maintenance of windows at Elmore Correctional Facility.
2. Due to unavoidable scheduling conflicts, counsel for PHS has been unable to meet with Staton Correctional Facility's Medical Director in order to provide a defense in this matter.
3. The brief extension of time requested herein will in no way prejudice any party, nor will it in any way delay the adjudication of this matter.

WHEREFORE, Prison Health Services, Inc. hereby requests this Court afford it 14 days to submit a Special Report and Answer on April 24, 2006.

Respectfully submitted,

S/L. Peyton Chapman, III  
Alabama State Bar Number CHA060  
S/R. Brett Garrett  
Alabama State Bar Number GAR085  
Attorneys for Defendant Prison Health  
Services, Inc.

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has been served by U.S. Mail  
this the 7<sup>th</sup> day of April, 2006, to:

Larry Carl Dixon AIS# 138238  
Elmore Correctional Facility  
P.O. Box 8  
Elmore, Alabama 36025

s/R. Brett Garrett GAR085  
Attorney for Defendant Prison Health  
Services, Inc.